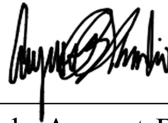


EXHIBIT “A”



Honorable August B. Landis
United States Bankruptcy Judge



Entered on Docket
September 20, 2021

Douglas D. Gerrard, Esq.
Nevada Bar No. 4613
dgerrard@gerrard-cox.com
Gary C. Milne, Esq.
Nevada Bar No. 3653
gmilne@gerrard-cox.com
GERRARD COX LARSEN
2450 Saint Rose Parkway, Suite 200
Henderson, Nevada 89074
(702) 796-4000
Attorneys for Creditor,
WOODS & ERICKSON, LLP

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In Re:

ANDREW B. PLATT and RUTH ANN PLATT

Debtor(s).

WOODS & ERICKSON, LLP, a Nevada
Limited Liability Partnership, d/b/a WOODS
ERICKSON & WHITAKER, LLP, et al,

Plaintiff,

vs.

ANDREW B. PLATT, an individual, et al,

Defendants.

Case No. BK-S-19-17282-abl

Adversary Proceeding: 19-01122-abl

Chapter 7

**STIPULATION AND ORDER TO
REMAND TO STATE COURT**

Creditor, WOODS & ERICKSON, LLP d/b/a WOODS ERICKSON & WHITAKER, LLP
("WEW" or "Firm"), by and through its attorneys, GERRARD COX LARSEN, and Debtor,
ANDREW B. PLATT ("Platt"), hereby stipulate and agree, as follows:

WHEREAS, on May 23, 2018, the Firm filed a lawsuit in the Eighth Judicial District Court,
Clark County, Nevada, Case No. A-18-774926-C ("State Court Action") against Platt (among
others);

1 WHEREAS, on November 13, 2019, with the State Court Action pending, Platt filed for
2 Chapter 7 Bankruptcy, commencing the underlying bankruptcy action (Case No. 19-17282-abl);

3 WHEREAS, the Firm then removed its State Court Action to this Court on December 13,
4 2019 (Case No. 19-01122-btb);

5 WHEREAS, on December 27, 2019, the Firm's non-dischargeability complaint was then
6 filed, on the basis of 11 U.S.C. 523(a)(4) and 523(a)(6). (Case No. 19-01125-abl);

7 WHEREAS, on May 18-21, 24-25, 2021, the Court conducted the trial in this matter;

8 WHEREAS, on July 29, 2021, the Honorable Bruce T. Beesley verbally announced his
9 decision in favor of the Firm, and stated that this case (Case No. 19-01122) needs to be remanded
10 back to the State Court Action upon entry of judgment, stating:

11 Any further matters in this case need to be handled in state court
12 because they're basically state court matters, and that's it.

13 WHEREAS, on August 26, 2021, a Judgment was entered against Platt and in favor of the
14 Firm in the non-dischargeability matter (19-01125) and the main bankruptcy (19-17282); and

15 WHEREAS, on September 9, 2021, Platt filed a Notice of Appeal with respect to the
16 Judgment.

17 The undersigned hereby stipulate and agree to entry of the following order:

18 IT IS HEREBY ORDERED that Case No. 19-01122-abl, filed in the United States
19 Bankruptcy Court for the District of Nevada, be remanded back to the Eighth Judicial District Court
20 of Nevada for Clark County (Case No. A-18-774926-C).

21 DATED this 20th day of September, 2021.

DATED this 20th day of September, 2021.

22 **GERRARD COX LARSEN**

23 /s/ Douglas D. Gerrard, Esq.

24 Douglas D. Gerrard, Esq.

25 Nevada Bar No. 4613

26 Gary C. Milne, Esq.

27 Nevada Bar No. 3653

28 2450 Saint Rose Parkway, Suite 200

Henderson, Nevada 89074

Attorneys for Creditor,

Woods & Erickson, LLP

/s/ Andrew B. Platt, Esq.

Andrew B. Platt, Esq.

Nevada Bar No. 10719

1827 W. 650 N.

Springville, UT 84663

Pro Se